Postal Regulatory Commission Submitted 3/20/2012 3:24:20 PM Filing ID: 81394 Accepted 3/20/2012

BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION SERVICE CHANGES, 2011

Docket No. N2012-1

UNITED STATES POSTAL SERVICE RESPONSE TO NATIONAL ASSOCIATION OF PRESORT MAILERS INTERROGATORY (NAPM/USPS-T4—4)

(March 20, 2012)

The United States Postal Service hereby files its responses to the above-listed interrogatory of the National Association of Presort Mailers, dated February 17, 2012. The interrogatory has been redirected from witness Neri to the Postal Service for response. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno Chief Counsel Global Business & Service Development

Caroline R. Brownlie

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260 (202) 268-3010; Fax -5287 March 20, 2012

INSTITUTIONAL RESPONSE OF THE UNITED STATES POSTAL SERVICE TO NATIONAL ASSOCIATION OF PRESORT MAILERS INTERROGATORY REDIRECTED FROM WITNESS NERI

NAPM/USPS-T4-4. Please refer to page 16 of your testimony where you state, "[p]resorted First-Class Mail for a mail processing facility's service area, entered by commercial mailers at co-located BMEU facilities (that is, BMEUs located at mail processing facilities) which meet the CAT at the co-located BMEU and the CET at the mail processing facility would be processed for the next day's delivery." And to page 18 where you further state, "[u]nder the proposal, earlier critical acceptance times ("CATs") would be established for mailings entered at BMEUs to align with revised critical entry times ("CETs") at mail processing facilities. Earlier acceptance and entry times would allow committed mail to reach the destinating processing facility in time to enable earlier and expanded mail processing."

- a. Please provide a detailed description of the Customer Acceptance Times (CAT) for mail entered at a co-located BMEU.
- b. Please provide a detailed description of the CATs for mail entered at BMEUs that are not co-located.
- c. Please confirm whether the CATs for the non-co-located BMEUs will be moved to earlier in the day for mailings presented and subsequently transported by the USPS to the origin facility. If confirmed, please provide a detailed description of the CATs for this mail. If not confirmed, please explain fully the acceptance through induction process for commercial mailings.
- d. Please confirm whether the BMEUs will remain open later for mailers and mail service providers that chose to present the mailing and transport it themselves (using a Form 8017) to the processing facility in time to meet the CET. If confirmed, please provide a detailed explanation of the proposed operating schedule. If not confirmed, please explain fully the acceptance through induction process for commercial mailings.
- e. Please confirm whether the Postal Service will continue to transport mail from local mail acceptance points to USPS processing facilities. If confirmed, please provide a detailed explanation of the expected CAT times by product for mail transported by the Postal Service. If not confirmed, please explain fully the acceptance through induction process for commercial mailings.

RESPONSE:

a) Unless otherwise explained by Postal Service witnesses in their testimony (e.g. USPS-T-7 at 5 and USPS-T-1 at 23-24), the Postal Service anticipates the CAT for next-day-delivery would be 08:00 for First Class Mail (FCM) prepared to the local SCF level and 12:00 (noon) for FCM prepared to the local 5-digit level. The 2&3-Day FCM at co-located Bulk Mail Entry Units is

INSTITUTIONAL RESPONSE OF THE UNITED STATES POSTAL SERVICE TO NATIONAL ASSOCIATION OF PRESORT MAILERS INTERROGATORY REDIRECTED FROM WITNESS NERI

anticipated to be 18:00. The CAT For 2&3 Day FCM is established to meet the window of operation for outgoing mail at the host mail processing site.

- b) Unless otherwise explained by Postal Service witnesses in their testimony (e.g. USPS-T-7 at 5 and USPS-T-1 at 23-24), the Postal Service anticipates the CAT for 2&3-Day FCM at non co-located Bulk Mail Entry Units to be 15:00. The CAT is necessary to allow travel time to meet the window of operation for outgoing mail at the host mail processing site. There will be no availability of next-day-delivery at a non co-located BMEU.
- c) See the responses to subparts (a) and (b).
- d) The Postal Service is currently evaluating whether it will need to change BMEU hours based on mailers' needs. This evaluation will also determine whether later acceptance will be necessary. See also the response to NAPM/USPS-T7-8(b) and (d).
- e) The Postal Service will continue to transport mail from local mail acceptance points to USPS processing facilities in the near term. See also the responses to subparts (a), (b), and (d).